



**STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL**

ERIC T. SCHNEIDERMAN
Attorney General

STATE COUNSEL DIVISION
Litigation Bureau

Writer Direct: (518) 776-2293
John.Moore@ag.ny.gov

May 10, 2017

Hon. Daniel J. Stewart, U.S. Magistrate Judge (via ECF)

United States District Court
Northern District of New York
James T. Foley U.S. Courthouse
445 Broadway, Room 441
Albany, NY 12207

Re: *Oliver v NYS Police*
Northern District of New York
15-CV-0444 (BKS)(DJS)

Dear Judge Stewart:

This office represents Defendants in this litigation. As the Court is aware, an investigation regarding potential conflicts in representation concerning the multiple defendants in this litigation is currently being conducted. Per the Court's April 14, 2017 Order [Dkt. 69], Defendants are obligated to respond to the Complaint on or before May 15, 2017.

I've been advised by the individuals conducting the conflict review that it is taking longer than anticipated to complete the investigation. Defendants respectfully request an additional 30-day period to complete the investigation so that conflict/representational issues, if any, can be identified and resolved before an Answer is filed.

I have inquired with Plaintiff's counsel, David DeChelis, Esq., regarding this request and have been advised that Plaintiff's position has not changed regarding extensions.

Thank you for your kind consideration to this request.

Respectfully yours,

s/ *John F. Moore*

John F. Moore, A.A.G.

Attorney for Defendants

Office of the Attorney General, Litigation Bureau

The Capitol

Albany, New York 12224-0341

Phone: 518-776-2293

Email: John.Moore@ag.ny.gov

JFM/jfm

cc: **Harvey P. Sanders, Esq. (via ECF)**
David J. DeChellis, Esq. (via ECF)
Sanders & Sanders
401 Maryvale Drive
Cheektowaga, New York 14225